

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JANE DOE

Plaintiff

Case No. 2:13-cv-00486-GLF-MRA

The Honorable Judge Gregory L.

Frost

VS.

ROY CHANSON, AMY CHANSON

ROY AND AMY CHANSON'S RESPONSE TO  
PLAINTIFFS MOTION TO STRIKE

ROY AND AMY CHANSON'S MOTION TO STRIKE THE PLAINTIFF'S MOTION TO  
STRIKE ALL PLEADINGS BY ROY AND AMY CHANSON

Introduction

The Chansons ask the court to dismiss the Plaintiff's motion to strike. Roy and Amy Chanson are defending themselves pro se. Roy and Amy Chanson are residents of the State of New Jersey. Roy and Amy Chanson do not have an attorney. Roy and Amy Chanson secured the services of SmithDehnIndia a professional legal outsourcing company (SmithDehnIndia.com- see exhibit A) which was recommended by our former attorney from a previous case in Nevada. Considering the Chanson's lack of funds, they decided to use the legal outsourcing company SmithDehnIndia in writing the Motion to Dismiss and Motion for Sanctions.

Statement of Facts

The plaintiff's attorney continues to site Ronald Green's alleged conversations regarding the website. These conversations did not take place. The plaintiff's attorneys and employees continue to make false statements about conversations they had with Amy.

The Chansons agree they need the aid of this Court to provide a remedy. Roy and Amy Chanson have had no involvement with the website and should not be defendants in this lawsuit . We

hope the Court will see fit to dismiss Roy and Amy Chanson from this lawsuit as they had no association whatsoever with the website and impose sanctions on Plaintiff(s) attorneys.

Conclusion

It is our understanding that Kevin Bollaert has shut down the Yougotposted.com website and it is no longer on the internet. In summary, we ask the court to strike and dismiss the plaintiff's motion to strike and dismiss for the following reasons; We do not have an attorney because we cannot afford one. We employed the services of SmithDehnIndia to write the motions. We were not involved with the website and hope the Court will see fit to dismiss Roy and Amy Chanson from this lawsuit.

October 15, 2013 Case no. 2:13-cv-00486

Respectfully submitted:



Roy Chanson

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Princeton Junction, New Jersey 08550

609-548-6095 roy.chanson@gmail.com



Amy Chanson

21 Coneflower Lane

Princeton Junction, New Jersey 08550

609-548-6067

Dated: October 15, 2013

Case No. 2:13-cv-00486

Certificate of Service

This document was served upon the parties via US Mail.

Kevin Bollaert

1765 Garnet Ave 27

San Diego, CA 92109

Mark J. Randazza

Randazza Legal Group

3625 S. Town Center Drive

Las Vegas, NV 89135

H. Louis Sirkin

600 Vine Street Suite 2700

Cincinnati, OH 45202

Case No.2:13-cv-GLF-MRA

October 16, 2013

## EXHIBIT A

Gmail - From: Amy and Roy Chanson

<https://mail.google.com/mail/u/0/?ui=2&ik=ffbcefb66b&view=pt&sea...>



Roy Chanson <roy.chanson@gmail.com>

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**From: Amy and Roy Chanson**

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Vidya <vidya@smithdehnindia.com>

Wed, Oct 16, 2013 at 2:09 AM

To: Roy Chanson <roy.chanson@gmail.com>

Hi Roy and Amy,

We are an offshore legal services firm. We are a company incorporated in India and have several Indian attorneys and non-attorneys working here doing research and drafting documents. You could also refer the judge to our website if that is of interest to him/her. [www.smithdehnindia.com](http://www.smithdehnindia.com)

Best,  
Vidya

VIDYA DEVALAH  
Managing Director

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LAW WITHOUT BORDERS

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managed by

**SmthDehn**  
[www.smithdehn.com](http://www.smithdehn.com)

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